1	Gary E. Di Grazia, Esq.		
2	P.O. Box 1358 Elko, NV 89801 Telephone: (775) 738-8091		
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7	davidstanton@frontiernet.net  Attorneys for Defendants		
8	Genesis Home Health Services, Inc. and Querubin Iguban, Jr., M.D.		
9	UNITED STATES DISTRICT COURT		
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12	NEW HORIZON HOME CARE, LLC, and Case No.: 3:19-cv-00521-RCJ-WGC		
13	GUIDING LIGHT HOSPICE, INC.,		
14	Plaintiffs, STIPULATION AND REQUEST FOR		
15	vs. EXTENSION OF TIME [FIRST REQUEST]		
16	NORTHEASTERN NEVADA REGIONAL HOSPITAL, HORIZON HOSPICE, INC.,		
17	GENESIS HOSPICE, LLC, GENESIS HOME HEALTH SERVICES, INC.,		
18	HIGHLAND MANOR, DREW BANFORD, BILLIE JEAN CRAWFORD, TRAVIS		
19	SPENCER, QUERUBIN IGUBAN, JR., M.D., DEBRA ANDERSON,		
20	MARISSELLA (CHELLA) ELLIOT, ALICE ALLEN,		
21	Defendants.		
22 23	Defendants GENESIS HOME HEAT TH SERVICES INC. a Navida Comparation and		
24	Defendants, GENESIS HOME HEALTH SERVICES, INC., a Nevada Corporation, and		
25	QUERUBIN IGUBAN, JR., M.D., by and through their counsel GARY E. DI GRAZIA, Esq. of the law firm of GOICOECHEA, DI GRAZIA, COYLE & STANTON, LTD., pursuant to FRCP		
26	6(b)(1)(A) and LR IA 6-1, respectfully request this Court for an extension of time until		
27	November 26, 2019 to provide a responsive pleading to Plaintiffs' Complaint in the above-		
28	entitled matter for each of the following reasons:		

1	1. Defendants have been notified that it will take an additional seven (7) to ten (10)		
2	days for its insurance company to determine coverage and to, therefore, assign counsel;		
3	2. This extension request is only for fourteen (14) days and this is the first request by		
4	these Defendants for any extension of time; and,		
5	3. Counsel for Plaintiffs is not opposed to extend the time as described above.		
6	<b>DATED:</b> November 7, 2019.	<b>DATED:</b> November 7, 2019.	
7 8	GOICOECHEA, DI GRAZIA, COYLE & STANTON, LTD. Attorneys for Defendants,	<b>KENT LAW</b> Counsel for Plaintiffs, New Horizon Home Care, LLC and	
9	Genesis Home Health Services, Inc. and Querubin Iguban, Jr., M.D. 530 Idaho Street Elko, NV 89801	Guiding Light Hospice, Inc. 201 West Liberty Street, Suite 320	
10		Reno, NV 89501 Telephone: (775) 324-9800	
11		Facsimile: (775) 324-9803	
12	By: <u>/s/ Gary E. Di Grazia</u>		
13	GARY E. DI GRAZIA Nevada Bar No. 198	By: /s/ (Electronic Signature Authorized) STEPHEN S. KENT	
14	DAVID M. STANTON Nevada Bar No. 4389	Nevada Bar No. 1251 skent@skentlaw.com	
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18		IT IS SO ORDERED:	
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20		William G. Cobb	
21		UNITED STATES MAGISTRATE JUDGE	
22		DATED: November 8, 2019	
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